

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

In re:

JERRY A. LEWIS,  
Debtor

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Case No.: 8:09-bk-08409-MGW  
Chapter 7

ANDREA P. BAUMAN,  
CHAPTER 7 TRUSTEE,  
Plaintiff,

Vs.

Adv. Proc. No. 8:13-ap-00935-MGW

MARY E. LEWIS,  
LEWIS' 8001 ENTERPRISES, INC., a Florida Corporation Dissolved in 1999,  
LEWIS' 8001 ENTERPRISES, INC., a Florida Corporation Dissolved in 2006,  
8001 LAND RECOVERY, LLC, a Florida LLC Dissolved in 2003,  
U.S. ENVIRONMENTAL PROTECTION AGENCY,  
U.S. DEPARTMENT OF THE TREASURY,  
FLORIDA DEPARTMENT OF ENVIRONMENTAL  
PROTECTION,  
ENVIRONMENTAL PROTECTION  
COMMISSION OF HILLSBOROUGH COUNTY,  
HILLSBOROUGH COUNTY, FLORIDA,  
LEVINE HIRSCH SEGALL MACKENZIE & FRIEDSAM P.A., a Florida Corporation  
Dissolved in 2014,  
IRAVANI P.A.,  
RICARDO A. ROIG, P.L.,  
CARLTON FIELDS JORDEN BURT, P.A.,  
AYRES ASSOCIATES, INC, f/k/a OWEN AYRES &  
ASSOCIATES, INC,  
ROSS A. FERTIC,  
ROSEMARY CONKEY A/K/A ROSEMARY GIBSON,  
GULF COAST RECYCLING, INC.,  
RINGPOWER CORPORATION,  
RICHARD III, LLC,  
ENVIRONMENTAL ENGINEERING CONSULTANTS, INC.,  
WW, LLC, a Florida LLC Dissolved in 2012,  
FLORIDA ENVIRONMENTAL RESOURCES CORPORATION, a Florida Corporation  
Dissolved in 2007,  
MICHAEL L. CONE  
DOYLE CORPORATION F/K/A DOYLE MINES, INC., a Florida Corporation  
Dissolved in 2005,  
Defendants.

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**ANSWER OF DEFENDANT RICARDO A. ROIG, P.L. TO COUNT III OF THE  
SECOND AMENDED COMPLAINT FOR DECLARATORY JUDGMENT ON ALTER  
EGO, DECLARATORY JUDGMENT FOR SIMPLE TITLE AND ACTION FOR  
AUTHORITY TO SELL REAL ESTATE FREE AND CLEAR PURSUANT TO 11 U.S.C  
§363 (b)(f) and (h) (Docket No. 33)**

Defendant, Ricardo A. Roig, P.L., one of the listed defendants on the subject styled case, for his answer and affirmative defenses state as follows:

**ANSWER**

For their answer to the Second Amended Complaint for Declaratory Judgment on Alter Ego, Declaratory Judgment for Simple Title and Action For Authority to Sell Real Estate Free and Clear Pursuant to 11 U.S.C §363 (b)(f) and (h) (docket no. 33) and responding to the correspondingly numbered paragraphs in Count III, Defendant (hereinafter "Defendant" or "Defendants") state:

**General Allegations as to Count 111 of Second Amended Complaint**

1. Count III, Number 41 Neither Deny or Admit.
2. Count III, Number 42 Admit and Consent subject to transfer of right if any to proceeds from sale.
3. Count III, Number 43 Admit and Consent, however same response as Number 42.
4. Count III, Number 44 Admit and Consent, however same response as Number 42.
5. Count III, Number 45 Admit and Consent, however same response as Number 42.
6. Count III, Number 46 Admit and Consent, however same response as Number 42.
7. Count III, Number 47 Admit and Consent, however same response as Number 42.

/s/ Curran K. Porto

Curran K. Porto, PA  
Porto Legal Center  
410 S. Ware Blvd., Suite 404  
Tampa, FL 33619  
Tel. No. 813.626.0088  
Fax. No. 813.626.5252  
Primary email: [plc@portolegalcenter.com](mailto:plc@portolegalcenter.com)  
2nd email: [curran@portolegalcenter.com](mailto:curran@portolegalcenter.com)  
Attorney for Defendant Ricardo A. Roig, PL

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished via electronic and/or U.S. Mail on the 3<sup>rd</sup> day of March, 2015, to:

Donica Law Firm, P.A.  
Counsel for Plaintiff  
106 S. Tampania Ave., Suite 250  
Tampa, FL 33609-3248  
[herb@donicalaw.com](mailto:herb@donicalaw.com)